

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

United States of America, Plaintiff, v. Dennis E. Hecker, Defendant.	Case No. 0:10-CR-32 (01) JNE/SRN MOTION FOR DISCLOSURE AND SUPPRESSION OF WIRE TAPS, ORAL COMMUNICATIONS OR OTHER ELECTRONIC EAVESDROPPING
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The defendant, DENNIS E. HECKER, by and through his attorney, Brian N. Toder, hereby moves the Court, pursuant to Rule 41(e) of the Federal Rules of Criminal Procedure and 18 U.S.C. sec. 2518(10) and 3504, for an order requiring the government to disclose all logs, records, memoranda and other documents and recordings to the electronic surveillance or wire tapping directed against the defendant herein, and moves that the evidence from such surveillance, and any evidence derived therefrom, be suppressed on the grounds that:

1. the communication was unlawfully intercepted;
2. the order of authorization or approval under which the communication was intercepted is insufficient on its face; and

3. the interception was not made in conformity with the order of authorization or approval on the grounds that:
- a. other investigative techniques had not been exhausted;
 - b. the minimization requirement was not complied with;
 - c. any other grounds which may become apparent prior to, or at the time of hearing of said motion.

The motion is based on the indictment, the files and records and proceedings herein, and all oral testimony to be given at the hearing of this motion.

Respectfully submitted,

Dated: May 24, 2010

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